

**REMARKS**

Claims 1-35 are pending in this application. By this Amendment, claims 1, 14 and 17 are amended. No new matter is added. Reconsideration in view of the foregoing amendments and the following remarks is respectfully requested.

Applicant thanks Examiner Kovalick for the courtesies extended to Applicant's representatives during the October 30 personal interview. During the interview, the Examiner agreed that the §112 rejection would be withdrawn. The rejected claims and applied prior art were also discussed.

**I. Formal Matter**

A. Applicant notes with appreciation the indication of allowable subject matter in claims 5, 7-8, 10-12, 18, 20-21, 26-27 and 30. These claims are not rewritten in independent form at this time, since their base claims are allowable as describes in detail below.

Applicant also notes with appreciation the allowance of claims 28 and 29.

B. The Office Action rejects claims 19 and 31-34 under 35 USC §112, first paragraph, asserting that a limitation an "electro-optical conversion section" recited in the claims is not supported in the specification. Applicant respectfully disagrees.

As described at paragraph [0090], for example, an OEL (Organic ElectroLuminescent) luminescent section 25 is constituted with OEL devices. The OEL device is a current-driven electroluminescent device, that is a spontaneous luminescent device which emits light upon supply of electric current. As shown in Fig. 7, for example, a signal transmission through VOEL is converted into luminescence on the basis of a signal held by the storing circuit section 21. Accordingly, as agreed during the interview, there is a sufficient disclosure in the specification to fully enable and support the claimed feature. As such, Applicant respectfully requests withdrawal of this rejection.

C. The Office Action objects to the drawings under 37 CFR §1.83(a), asserting that the feature "electro-optical conversion section" must be shown. As described above and agreed during the interview, the OEL luminescent section 25 is shown in Fig. 6, for example. Therefore, no corrections are necessary.

Withdrawal of this objection is respectfully requested.

## **II. The Pending Claims Define Patentable Matter**

A. The Office Action rejects claims 1 and 32-33 under 35 U.S.C. §102(e) over U.S. Patent No. 5,945,972 to Okumura et al. (Okumura).

Claim 1 recites, *inter alia*, that a storing section has memory cells configured by static circuits and holds binary signals and that a number of the memory cells corresponds to a tonal level. Claim 1 also recites that a degree of tonal level is determined by a digital signal stored in the memory cells. These features are described in the specification, for example, at page 12, lines 21-26 and page 14, line 31-page 15, line 1. In other words, by corresponding the number of memory cells to the tonal level, the tonal level (brightness) can be controlled well.

On the other hand, as discussed during the interview, Okumura teaches that memories store image data corresponding to one pixel of background image data and image data (see, col. 14, lines 7-14) and signals for different colors (see, col. 22, lines 14-15). In addition, as described at col. 9, lines 44-col. 20, line 48, the memory system of Okumura is used to switch the image for a right eye and the image of a left eye for a 3D display. Okumura does not teach or suggest controlling the tonal level using memory cells as claimed. Accordingly, Applicant respectfully submits that claim 1 is patentably distinct from the applied prior art.

Accordingly, withdrawal of this rejection is respectfully requested.

B. The Office Action rejects claims 2, 3 and 13 under 35 U.S.C. §103(a) over Okumura in view of U.S. Patent No. 5,515,068 to Uragami et al. (Uragami). This rejection is respectfully traversed.

Claim 2 recites, *inter alia*, a plurality of dots including a converting section that converts a value based on a value of the data signal held by a storing section into an analog signal, and a display control section that performs total control on the basis of the analog signal converted by the converting section. These features are described at paragraphs [0071]-[0072]. In other words, as discussed during the interview, as shown in Fig. 6, the converting section and the display control section are provided at the dots, and by doing so, the efficiency and life of a liquid crystal display increase.

The Office Action admits that Okumura does not teach or suggest these features, but Uragami does. Applicant respectfully disagrees.

The Office Action refers to col. 5, lines 37-38 and col. 6, lines 32-37 of Uragami for the teaching of the converting section, and col. 3, lines 44-67 and col. 4, lines 1-5 for the teaching of the display control section. However, first Applicant respectfully submits that the sections that the Office Action refers to relate to a palette memory PLM 1 and a video memory 102, which are shown in Fig. 1(b) and Fig. 1(a), respectively. As described at col. 3, lines 27-30, Fig. 1(a) is a diagram of an image processing system using a color palette device, and Fig. 1(b) is a block diagram of the color palette device. Thus, as described during the interview, Uragami does not teach or suggest that such a converting section and a display control section are included in the dots.

Moreover, as described at col. 1, lines 15-60, Uragami's invention relates to converting digital signals into analog signals to allow connection to a CRT (cathode ray tube). Therefore, the purpose of Uragami's invention is not the same as this claimed invention. Accordingly, one of ordinary skill in the art would not be motivated to combine Okumura and Uragami.

For at least these reasons, Applicant respectfully submits that claim 2 is patentably distinct from the applied prior art.

Claims 3 and 13 are allowable at least for their dependence on allowable base claim 2.

As such, Applicant respectfully requests withdrawal of this rejection.

C. The Office Action rejects claims 4 and 6 under 35 U.S.C. §103(a) over Okumura and Uragami in view of U.S. Patent No. 6,384,806 to Matsueda et al. (Matsueda). This rejection is respectfully traversed.

Claims 4 and 6 are allowable at least for their dependence on allowable base claims. Withdrawal of this rejection is respectfully requested.

D. The Office Action rejects claim 9 under 35 U.S.C. §103(a) over Okumura, Uragami and Matsueda in view of U.S. Patent No. 5,973,456 to Osada et al. (Osada). This rejection is respectfully traversed.

Claim 9 is allowable at least for its dependence on an allowable base claim.

E. The Office Action rejects claims 14-17 under 35 U.S.C. §103(a) over Okumura in view of U.S. Patent No. 6,518,941 to Kumura. This rejection is respectfully traversed.

Claims 14 and 17 are each amended to recite the features added to claim 1. Therefore, as described above, Okumura does not teach or suggest these features. Kimura fails to overcome the deficiency of Okumura. Accordingly, even if combined, Okumura and Kimura do not teach or suggest the claimed invention.

Claims 15 and 16 are allowable at least for their dependence on allowable base claim 14.

At least for the reasons discussed above, Applicant respectfully request withdrawal of this rejection.

F. The Office Action rejects claims 19 and 22-25 under 35 U.S.C. §103(a) over Okumura in view of U.S. Patent No. 6,583,777 to Hebiguchi et al. (Hebiguchi) and U.S. Patent No. 6,278,428 to Smith. This rejection is respectfully traversed.

Claim 19 recites, *inter alia*, that each of a plurality of dots includes an electro-optical conversion section that performs an electro-optical conversion on the basis of the data signal held by storing section.

As described above, an example of the electro-optical conversion section is shown in Fig. 7 of the application, and a signal transmission through VOEL is converted into luminescence on the basis of a signal held by the storing circuit section 21.

In relation to dependent claim 32 (see item 6 of the Office Action), the Office Action asserts that Okumura teaches this feature at col. 18, lines 27-41 and Fig. 9). However, the cited section of Okumura merely relates to a memory circuit and does not provide any description of what might correspond to the electro-optical conversion section. Therefore, as discussed during the interview, Okumura does not teach or suggest the electro-optical conversion section. Hence, even combined, the applied prior art does not teach or suggest each and every feature of claim 19. As such, claim 19 is patentably distinct from the applied prior art.

Claims 22-25 are allowable at least for their dependence on allowable base claim 19.

Accordingly, withdrawal of this rejection is respectfully requested.

G. The Office Action rejects claims 34-35 under 35 U.S.C. §103(a) over Okumura in view of Hebiguchi and Uragami. This rejection is respectfully traversed.

Claim 34 recites that a plurality of dots include an electro-optical conversion section that performs an electro-optical conversion on the basis of the data signal held by a storing section.

The Office Action states that Okumura does not teach or suggest this feature but asserts that Uragami teaches this feature. First, Applicant respectfully submits that this statement by the Patent Office contradicts its earlier statement in relation to claim 32 in which

the Office Action states that Okumura allegedly teaches this feature. As such, this statement is improper.

Moreover, the Office Action refers to col. 3, lines 31-67 and col. 4, lines 1-3. As described above in relation to claim 2, Uragami does not relate to the field of the claimed invention, and thus Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to combine Uragami with Okumura and Hebiguchi. As such, Applicant respectfully submits that claim 34 is patentably distinct from the applied prior art.

Claim 35 is allowable at least for its dependence on allowable base claim 34.

Accordingly, withdrawal of this rejection is respectfully requested.

### **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-35 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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